

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TRUE RETURN SYSTEMS LLC,

Plaintiff,

v.

MAKERDAO,

Defendant.

Case No. 1-22-cv-8478-VSB

**DECLARATION OF DAVID A. BOAG IN SUPPORT OF
REQUEST TO ENTER DEFAULT**

I, David A. Boag, declare as follows:

1. I am over the age of 18 and a member in good standing of the State Bar of New York and certified to practice before this Court. I am the principal of Boag Law, PLLC, counsel of record for plaintiff True Return Systems, LLC (“TRS” or “Plaintiff”).

2. I make this declaration based upon personal knowledge, and I could and would competently testify to the facts stated herein if called to do so.

3. Plaintiff commenced the above-captioned action on October 5, 2022.

4. On November 30, 2022, Defendant MakerDAO was served with copies of the Summons and Complaint in the manner directed by the Court’s November 23, 2022 Order (Doc. 13). Proof of Service was filed with the Court on November 30, 2022 (Doc. 14).

5. To date, Defendant has not answered or otherwise moved with respect to the Complaint in this action.

6. The time within which Defendant was required to answer or otherwise move with respect to the Complaint in this action has expired.

7. The time within which Defendant was required to answer or otherwise move with respect to the Complaint in this action has not been extended.

8. To the best of my knowledge, Defendant is not an infant, incompetent or in the military service of the United States.

WHEREFORE, on behalf of Plaintiff, the undersigned requests, pursuant to Fed. R. Civ.P. 55(a), that the Clerk enter default against Defendant.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 3d day of January 2023.



David A. Boag